

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,	)	C.A. NO. 04-11193NG
Plaintiff	)	
	)	
v	)	
	)	
TIMOTHY CALLAHAN, ET AL.	)	
Defendant(s)	)	
	)	

**SUPPLEMENTAL DISCLOSURE PURSUANT TO RULE 26(A)(1) & (2)**

Now comes the Plaintiff in the above entitled matter and supplements its disclosure pursuant to Rule 26(a)(1) & (2) as follows:

1. Documents

- Findings of Fact and Rulings of Law, Defendant's Motion to Dismiss, Commonwealth v. Harris, Suffolk Superior 9125141;
- Memorandum in Order on Defendant's Motion for New Trial, Commonwealth v. Harding, Suffolk Sup. Ct. CR091158-62;
- Commonwealth's Motion to Vacate Conviction with Endorsement and Nolle Prosequi Commonwealth v. Passley;
- Commonwealth's Motion to Vacate Conviction with Endorsement and Nolle Prosequi Commonwealth v. Toro;
- Commonwealth's Motion to Vacate Conviction and Grant New Trial with Endorsement and Nolle Prosequi Commonwealth v. Cowans

2. Witnesses

- Tahann Harris

- Neal Miller
- Marlon Passley
- Angel Toro
- Donnell Johnson
- Louis Santos
- Counsel for Neal Miller
- Counsel for Marlon Passley
- Counsel for Angel Toro
- Counsel for Donnell Johnson
- Counsel for Louis Santos
- Counsel for Tahann Harris

Respectfully submitted,

By His Attorneys,

/s/ Michael Reilly

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